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18 UNITED STATES DISTRICT COURT
19 NORTHERN DISTRICT OF CALIFORNIA

20 **Orlando Garcia,**

21 Plaintiff,

22 v.

23 **Masa, Inc.,** a California Corporation,

24 Defendants.

Case No.: 4:21-cv-04693-HSG

**JOINT STIPULATION AND
REQUEST TO FOREGO
THE JOINT SITE
INSPECTION ; ORDER**

General Order 56

Hon. Haywood S Gilliam, Jr.

COME NOW THE PARTIES, BY AND THROUGH THEIR COUNSEL OF
RECORD, STIPULATE, AS FOLLOWS:

1. WHEREAS, pursuant to the Court's June 22, 2021, Order (Dkt. 6), the
deadline to hold the joint inspection of the premises is 60 days after service of

1 complaint;

2 2. WHEREAS, Defendant was served on July 30, 2021;

3 3. WHEREAS, deadline to hold the joint inspection of the premises was
4 September 28, 2021;

5 4. WHEREAS, Defendant filed answer on July 27, 2021 (Dkt. 8);

6 5. WHEREAS, the parties are currently engaged in settlement discussions and
7 have reached an agreement regarding the remediation of the subject property;
8 and
9

10 6. WHEREAS, Defendant has agreed to remedy all barriers to access alleged in
11 the complaint at the subject property by a date certain and the Parties have
12 memorialized this in writing; and

13 7. WHEREAS, the parties wish to forego the joint site inspection required under
14 General Order no. 56 in favor of a cost-effective settlement;

15 8. WHEREFORE, it is hereby stipulated, subject to the approval of the Court, and
16 which the parties jointly request, that they be relieved from their obligation to
17 conduct the joint site inspection under General Order no. 56. It is further
18 stipulated that all dates based on the Joint Site Inspection deadline shall be
19 recalculated from the date of this Court's Order.
20
21
22

23 IT IS SO STIPULATED.
24

25
26 Dated: Dec 6, 2021

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27 By: /s/Cara Townsend
28 Cara Townsend, Esq.
Attorney for Plaintiff

1 Dated: December 6, 2021

SWEENEY MASON LLP

2
3 By: /s/ Cara Townsend
4 Christopher J. Olson, Esq.
5 Attorney for Defendant

6 **SIGNATURE ATTESTATION**

7
8 I hereby attest that all signatories listed above, on whose behalf this
9 Stipulation is submitted, concur in the filing's content and have authorized the
10 filing.
11

12
13
14 Dated: December 6, 2021

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16
17 By: /s/ Cara Townsend
18 Cara Townsend, Esq.
19 Attorney for Plaintiff

20 **ORDER**

21
22
23 DATED: 12/14/2021

